

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FINJAN SOFTWARE, LTD., an Israel)	
corporation,)	
)	
Plaintiff,)	Civil Action No. 06-369-GMS
)	
v.)	
)	
SECURE COMPUTING CORPORATION, a)	
Delaware corporation; CYBERGUARD)	
CORPORATION, a Delaware corporation,)	
WEBWASHER AG, a German corporation and)	
DOES 1 THROUGH 100,)	
)	
Defendants.)	

**FINJAN'S AMENDED MOTION FOR ENTRY OF PERMANENT
INJUNCTION PURSUANT TO 35 U.S.C. § 283**

Pursuant to 35 U.S.C. § 283, Plaintiff Finjan Software, Ltd. ("Finjan") files this Motion For Entry Of A Permanent Injunction ("Motion") against further infringement by Secure Computing Corporation, Cyberguard Corporation and Webwasher AG (collectively the "Defendants"). Pursuant to the stipulated briefing schedule, Finjan will serve and file its opening brief in support of this Motion not later than April 25, 2008.

On March 12, 2008, the jury returned a verdict finding that Defendants willfully infringed all of the asserted claims of United States Patent Nos. 6,092,194 ("194 Patent"), 6,804,780 ("780 Patent") and 7,058,822 ("822 Patent") (collectively "the Finjan Patents") in the above-captioned litigation. On March 14, 2008, the Court entered the jury's verdict (D.I. 226); the Court entered judgment in favor of Finjan and against Defendants on March 28, 2008 (D.I. 242).

Section 283 authorizes the Court to "grant injunctions in accordance with the principles of equity to prevent the violation of any right secured by patent, on such terms the court deems reasonable." 35 U.S.C. § 283. The record and the jury's finding demonstrate that Finjan's patent rights have been willfully infringed by Defendants, and that Defendants continue to infringe the Finjan Patents.


Therefore, for the foregoing reasons and those that will be set forth in Finjan's briefs to be submitted in accordance with the stipulated briefing schedule, Finjan respectfully requests that the Court grant its Motion.

OF COUNSEL:

Paul J. Andre
Lisa Kobialka
King & Spalding LLP
1000 Bridge Parkway
Redwood City, CA 94065
(650) 590-0700

Dated: April 4, 2008
858697

POTTER ANDERSON & CORROON LLP

By: 
Philip A. Rovner (#3215)
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com

*Attorneys for Plaintiff
Finjan Software, Ltd.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on April 4, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY HAND DELIVERY AND E-MAIL

Frederick L. Cottrell, III, Esq.
Kelly E. Farnan, Esq.
Richards, Layton & Finger, P.A.
One Rodney Square
920 N. King Street
Wilmington, DE 19801
cottrell@rlf.com; farnan@rlf.com

I hereby certify that on April 4, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

Jake M. Holdreith, Esq.
Christopher A. Seidl, Esq.
Robins, Kaplan, Miller & Ciresi L.L.P.
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402
jmholdreith@rkmc.com; caseidl@rkmc.com



Philip A. Rovner (#3215)
Potter Anderson & Corroon LLP
Hercules Plaza
P.O. Box 951
Wilmington, Delaware 19899
(302) 984-6000
E-mail: provner@potteranderson.com